## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

In re:	)	Chapter 11
CIDCUIT CITY STODES INC. 4 4	)	Cose No. 00 25652 (VDII)
CIRCUIT CITY STORES, INC., et al.,  Debtors.	)	Case No. 08-35653 (KRH) (Jointly Administered)
	)	(Johnty Administered)

## MOTION FOR ADMISSION PRO HAC VICE OF REGINA STANGO KELBON

Pursuant to Local Bankruptcy Rule 2090-1(E), John E. Lucian, a member of the bar of this Court, moves the admission of Regina Stango Kelbon, Esquire, to appear *pro hac vice* in the captioned proceeding and any related adversary proceedings as counsel for Cellco Partnership d/b/a Verizon Wireless and states as follows:

- 1. The proposed admittee is not a member of the Bar of Virginia.
- 2. The proposed admittee is a member in good standing of the bars of the Commonwealth of Pennsylvania and the State of New Jersey.
- 3. During the twelve months immediately preceding the filing of this motion, the proposed admittee has not sought admission in this Court.
- 4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law by any jurisdiction.
- 5. The proposed admittee is familiar with the Federal Rules of Bankruptcy
  Procedure, the Local Rules of the United States Bankruptcy Court for the Eastern District of
  Virginia and the Federal Rules of Evidence.

John E. Lucian, Esquire Virginia Bar No. 43558 Blank Rome LLP One Logan Square Philadelphia, PA 19103

Counsel for Cellco Partnership d/b/a Verizon Wireless

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6. The proposed admittee understands that she shall be subject to the disciplinary jurisdiction of this Court and that his conduct is subject to the ethical standards set forth in LBR 2090-1(I).

7. The undersigned, submitting the within Motion on behalf of the proposed admittee in this proceeding, has been formally admitted to the bar of this Court and is a member in good standing.

8. The proposed admittee understands that admission *pro hac vice* does not constitute formal admission to the bar of the United States Bankruptcy Court for the Eastern District of Virginia.

WHEREFORE, the undersigned respectfully requests that this Court admit Regina Stango Kelbon *pro hac vice* and grant such other relief as is appropriate and just.

BLANK ROME LLP

/s/ John Lucian

John Lucian Virginia Bar No. 43558 One Logan Square Philadelphia, PA 19103 (215) 569-5442

ACKNOWLEDGED:

**BLANK ROME LLP** 

/s/ Regina Stango Kelbon Regina Stango Kelbon One Logan Square Philadelphia, PA 19103 (215) 569-5507

Dated: December 5, 2008

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of December, 2008, a copy of the foregoing Motion for Admission Pro Hac Vice of Regina Stango Kelbon was served electronically via the Court's CM/ECF system to all parties so subscribed.

/s/ John Lucian